

the legend "Prior Art." The corrected drawing does not add any new matter.

REMARKS

Examiner has rejected claims 1-3, 6, and 8 under 35 USC 102(b) as being anticipated by Haran (Reference: Danny Haran, "Deploying IN Services in a Mobile Environment," *1997 Annual Review of Communications*, pp.1043-1049), but has indicated allowable subject matter in claims 4, 5, 7, and 9.

In response to Examiner's rejections, Applicant respectfully submits the following general comments regarding Haran:

Haran describes a conventional telephone system for providing intelligent network services, where these services may be accessed by mobile subscribers. Such a conventional system could be thought of as generally depicted in Applicant's Figure 2, with the significant difference that Applicant's Figure 2 shows an inventive message server. Such a message server is neither taught nor suggested by Haran. As a consequence, Haran does not and cannot provide the functions of Applicant's inventive message server.

In other words, in a conventional telephone system the mobile subscriber can be connected to only one service node (the one he or she is registered with), which is designated by the home location register. By contrast, Applicant's inventive system enables a mobile subscriber to connect to any service node and to receive any service that is desired. This substantial improvement offered by Applicant's invention is provided by the message server. According to Applicant's invention, there is no need for the home location register to be involved in or consulted regarding each connection for each service request, except for the original connection to the message server.

Turning now more specifically to Examiner's comments:

As described and provided for in independent Claims 1 and 8, the message server means resides in front of the service node. The mobile subscriber can be connected to any one of multiple service nodes depending upon the requested service. The application or requested service is not provided by the message server means, which instead provides only handling of messages. This aspect is entirely different from the Trilogue Infinity IP/SN of Haran (page 1045, col. 1, lines 38-41). As its name suggests, the Trilogue product acts as a conventional service node. Alternatively, the description of the Trilogue product indicates that the product can be connected at most to one service node, and functions in effect as a service node in a conventional telephone network. Consequently, in contrast with Applicant's invention, the Trilogue product neither act as a message server nor provides the functions of a message server.

The SRI message referred to in Haran (page 1046, col. 2, lines 14-17) is an aspect of normal telephone network system operation, and is normally provided in a conventional public telephone system that provides voice service. This SRI message is not equivalent to the message signals that are created in response to transaction signals according to Applicant's invention. Applicant's transaction signals allow multiple services over multiple service nodes to be made available to a mobile subscriber, which cannot be achieved by Haran.

Haran refers to the allocation of a customer to a particular service node under the direction of the home location register (page 1048, col. 1, lines 47-50). As occurs in a conventional telephone system, the home location register determines the dedicated service node to which the customer can be connected. This is in contrast with the functioning of the message router according to Applicant's invention, whereby any customer may be connected to, and have access to, the services provided by any service node of the network. Thus Applicant's system removes the dependency that exists in conventional telephone systems wherein customers are associated with particular service nodes. There is no teaching in Haran of the routing of customers to various service nodes, as according to Haran each customer can be connected to only one service node, which is the service node in the area where the customer is located. Haran describes a conventional telephone system wherein the home location register is relied upon to route customer calls for service to one service node, whereas

according to Applicant's invention it is the message router acting in response to the transaction signals which determines how calls are to be routed to one or more service nodes.

For the above reasons, Applicant respectfully submits that independent claims 1 and 8 are not anticipated by Haran, and requests that these claims be reconsidered and allowed. Likewise, Applicant respectfully requests that claims 2-7 and 9, which are dependent upon claims 1 and 8, also be allowed.

Respectfully submitted,

By: David R. Irvin

David R. Irvin, Agent

Reg. No. 42,682

David R. Irvin
IBM Corporation T81/503
PO Box 12195
Research Triangle Park, NC 27709